

Monte J. White and Associates
Monte J. White
1106 Brook Ave, Hamilton Place
Wichita Falls, TX 76301
(940)723-0099
(940)723-0096 Fax

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION

IN RE: §
Paul Lewis Reis, Jr. § Case No. 09-70166-HDH-13
and §
Marithe Evelyn Reis §
DEBTORS §

RESPONSE TO MOTION FOR RELIEF FROM ORDER OF DISMISSAL

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now Attorney, Monte J. White, in the above-titled cause and files this Response to Motion for Relief from Order of Dismissal.

On 1/21/2010, Attorney, Ron L. Yandell, on behalf of Debtors, filed a Motion for Relief from Order of Dismissal. In response thereto, Attorney, Monte J. White, would show the following:

1. Denied.
2. Denied. Since Debtor, Paul Lewis Reis, Jr., was no longer employed, there was no need for a withdrawal of the wage withholding order. Mr. Yandell should also be well aware, because of his bankruptcy experience, that should a wage withholding order need to be withdrawn it is the Chapter 13 Trustee who would initiate such withdrawal, not Debtors' attorney. Mr. Yandell never called the office of Monte J. White and Associates with a request for facts or information regarding the history or status of this case.
3. Attorney, Monte J. White, supports the reinstatement of this case, and is not opposed to the substitution of counsel by Mr. Yandell and the payment of any remaining fees due under this plan to him.

Respectfully submitted,

/s/Monte J. White
Attorney for Debtors

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Response to Motions for Relief from Order of Dismissal was served by ECF and/or mailed on February 1, 2010, to the following as indicated:

/s/Monte J. White

Case 09-70166-hdh13 Doc 76 Filed 02/01/10 Entered 02/01/10 14:02:00 Desc Main
Label Matrix for local noticing Bowie ISD Texoma Community Credit Union
0539-7 c/o Andrew Dylan Wood 3800 Sheppard Access Rd
Case 09-70166-hdh13 Ray, Wood & Bonilla Wichita Falls, TX 76306-4227
Northern District of Texas P O Box 165001
Wichita Falls Austin, TX 78716-5001
Mon Feb 1 13:53:43 CST 2010

1100 Commerce Street 1st Nationwide-Most Funding 2 AT & T Wireless
Room 1254 Po Box 1418 PO Box 62005
Dallas, TX 75242-1305 Camarillo, CA 93011-1418 Dallas, TX 75262

Arrow Fin Svcs-AFS Assignee of Cortrust
5996 W Touhy Ave
Niles, IL 60714-4610

Arrow Financial Svcs-Premier Bank
5996 W Touhy Ave
Niles, IL 60714-4610

Asset Acceptance LLC
Po Box 2036
Warren MI 48090-2036

Asset Acceptance-Dell Financial Svcs
PO Box 2036
Warren, MI 48090-2036

Atlantic Credit-HSBC
P O Box 13386
Roanoke, VA 24033-3386

Bac - Fleet Bankcard
PO Box 26012
Greensboro, NC 27420-6012

Bowie Memorial Hospital
705 E Greenwood Ave
Bowie, TX 76230-3199

Cac Financial Corp
2601 Nw Expressway
Oklahoma City, OK 73112-7236

Calvary Portfolio Services-AT & T
Attention: Bankruptcy Department
PO Box 1017
Hawthorne, NY 10532-7504

(c)CBE GROUP-DIRECTV
131 TOWER PARK DR STE 1
WATERLOO IA 50701-9590

Citibank
8875 Aero Dr
San Diego, CA 92123-2251

Collection-Progressive Insurance
Po Box 9134
Needham, MA 02494-9134

Continental
Attn: Recovery
652 Bush River Rd
Columbia, SC 29210-7521

Credit Adjust-Collection Agency-TX Mem
2601 NW Express Way
Suite 1000 E
Oklahoma City, OK 73112-7238

Credit Solutions Corp
9573 Chesapeake Dr Ste 1
San Diego, CA 92123-1304

Executive Services-Clinics of North TX
1200 Austin St
Wichita Falls, TX 76301-4623

Executive Services-Texoma Urology
1200 Austin St
Wichita Falls, TX 76301-4623

Financial Control Svcs-Bowie-Mem Hosp
PO Box 21626
Waco, TX 76702-1626

First National Bank of Marin-Credit One
Customer Service
PO Box 98873
Las Vegas, NV 89193-8873

First Premier Bank
PO Box 5524
Sioux Falls, SD 57117-5524

Hsbc Bank
Po Box 5253
Carol Stream, IL 60197-5253

IRS Special Procedures
1100 Commerce St., Room 951
Mail Stop 5029 DAL
Dallas, TX 75242-1001

JC Penney-GE Money Bank
Attention: Bankruptcy Department
PO Box 103106
Roswell, GA 30076-9106

LVNV Funding LLC
Resurgent Capital Services
PO Box 10587
Greenville, SC 29603-0587

Case 09-70166-hdh13 Doc 76 Filed 02/01/10 Entered 02/01/10 14:02:00 Desc Main
Lacks Furniture Midland Credit Mgmt-SW Bell Document Page 4 of 5
2391 Ne Loop Suite 201 8875 Aero Dr
San Antonio, TX 78217 San Diego, CA 92123-2251
Midnight Velvet
Swiss Colony Midnight Velvet
1112 7th Ave
Monroe, WI 53566-1364

Montague CAD-City of Bowie
PO Box 121
Montague, TX 76251-0121

Montague County
c/o Sherrel K. Knighton
Linebarger Goggan Blair & Sampson, LLP
2323 Bryan Street Suite 1600
Dallas, TX 75201-2644

Monte J. White & Associates
1106 Brook Ave
Wichita Falls TX 76301-5009

NCO - Medclr-Wise Emergency Med Assoc
Attention: Bankruptcy
1804 Washington Blvd. Suite 450
Baltimore, MD 21230-1700

National Capital Management, LLC
8245 Tournament Drive
Suite 230
Memphis, TN 38125-1741

Nco Fin-09-DirectTV
507 Prudential Rd
Horsham, PA 19044-2308

PRA Receivables Management, LLC
As Agent Of Portfolio Recovery Assocs.
c/o Credit One Bank,n.a.
POB 41067
NORFOLK VA 23541-1067

PRA Receivables Management, LLC
As Agent Of Portfolio Recovery Assocs.
c/o Orchard Bank/Non Prime
POB 41067
NORFOLK VA 23541-1067

Paragonway-Lacks
2101 West Ben Whit
Austin, TX 78704-7516

Portfolio Recoveries-Collect America
Attention: Bankruptcy Department
PO Box 12914
Norfolk, VA 23541-0914

Portfolio Recovery-HSBC
120 Corporate Blvd Ste 1
Norfolk, VA 23502-4962

RJM Acquisitions Funding LLC
575 Underhill Blvd
Suite 224
Syosset, NY 11791-3416

Radiology of North Texas, P.A.
800 Rockmead Dr, Ste 210
Kingwood, TX 77339-2113

Roundup Funding, LLC
MS 550
PO Box 91121
Seattle, WA 98111-9221

Swiss Colony Inc
1112 7th Ave
Monroe, WI 53566-1364

TX Emergency Staffing Solution
PO Box 96118
Oklahoma City, OK 73143-6118

Texoma Community Cr Un
Po Box 1320
Wichita Falls, TX 76307-1320

The Local Federal Credit Union
8500 N Stemmons Fwy Ste
Dallas, TX 75247-3832

(p)VANDERBILT MORTGAGE AND FINANCE INC
P O BOX 9800
MARYVILLE TN 37802-9800

West Asset Mgt-Denton Regional Med Ctr
2703 N Highway 75
Sherman, TX 75090-2567

Wise Emergency Med Assoc, PA
PO Box 830
San Antonio, TX 78293-0830

Wise Regional Health System
2000 FM 51 South
Decatur, TX 76234-3702

Marithe Evelyn Reis
689 Williamson Rd
Bowie, TX 76230-8836

Monte J. White
Monte J. White & Associates, P.C.
1106 Brook Avenue
Wichita Falls, TX 76301-5009

Paul Lewis Reis Jr.
689 Williamson Rd
Bowie, TX 76230-8836

Ronald L. Yandell
Law Offices of Ron L. Yandell
705 Eighth St., Suite 720
Wichita Falls, TX 76301-6524

UST U.S. Trustee
1100 Commerce Street
Room 976
Dallas, TX 75242-1011

Walter 12,13 Ocheskey
6308 Iola Avenue
Lubbock, TX 79424-2735

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Vanderbilt Mortgage
500 Alcoa Trail
Maryville, TN 37804

Addresses marked (c) above for the following entity/entities were corrected
as required by the USPS Locatable Address Conversion System (LACS).

Cbe Group-DirectTV
131 Towe Park Dr Suite 1
Waterloo, IA 50702

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Montague County

(d)Bowie ISD
c/o Andrew Dylan Wood
Ray, Wood & Bonilla
P. O. Box 165001
Austin, TX 78716-5001

(d)Vanderbilt Mortgage and Finance, Inc.
P.O. Box 9800
Maryville, TN 37802-9800

End of Label Matrix
Mailable recipients 60
Bypassed recipients 3
Total 63